

SHER TREMONTE LLP

July 12, 2023

BY ECF

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Upon reconsideration, Defendant is granted one further extension of his current trip to France.

SO ORDERED.

/s/ Alvin K. Hellerstein
U.S.D.J.
July 12, 2023

Re: *United States v. Jona Rechnitz*, 16 Cr. 389 (AKH)

Dear Judge Hellerstein:

I represent Jona Rechnitz. I write on behalf of my client to respectfully request reconsideration of the Court's order denying his request to extend his international travel by several days until July 20. Dkt. # 199. The Court's stated reason for the denial was that "[e]xcessive international travel is not consistent with the purpose of his supervised release." *Id.* This request is not made lightly; however, reconsideration is warranted for several reasons:

First, Mr. Rechnitz is not on supervised release. He is on bail pending appeal (Mr. Rechnitz's appeal was heard by the Second Circuit on June 2, 2023). Consistent with that posture, the Court previously determined that Mr. Rechnitz is not a flight risk. Indeed, as Your Honor is aware, Mr. Rechnitz has traveled internationally with this Court's approval on multiple occasions and has always returned on the date approved. He appeared for sentencing in 2020 and has abided by every court order in the years since. Therefore, his travel is consistent with his status on bail pending appeal and the absence of any risk of flight.

Second, the request is not excessive, in that it is not for additional travel beyond what the Court already approved. Mr. Rechnitz is *currently in France*, and asked to extend his trip so that he could attend to business meetings after his wife returned to the United States (which she did on July 10). In this instance, Mr. Rechnitz asked for a six-day extension of travel previously approved. Mr. Rechnitz's last international trip was in February 2023, and prior to that, he traveled in December 2022. Mr. Rechnitz has sought to be judicious about his international travel, recognizing that the Court has been gracious in granting all of his previous requests.

Finally, Mr. Rechnitz has asked to extend his travel in this instance not for leisure but to attend to important business matters. Mr. Rechnitz's work and business opportunities are abroad. In order for him to be able to rebuild his life and make

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restitution in this matter (as he has continued to do even while challenging the Court's restitution order), it is imperative that he be able to pursue these opportunities. To the extent necessary, we can provide a letter from a business associate working with Mr. Rechnitz in Europe who can confirm his legitimate business purposes there.

Accordingly, I respectfully request on behalf of Mr. Rechnitz that the Court reconsider its prior order denying the extension of his current trip. I appreciate the Court's consideration.

Respectfully submitted,

/s/Noam Biale

Noam Biale

Attorneys for Jona Rechnitz

cc: All counsel of record (by ECF)